

Exhibit A

Affidavit of

EDWIN D DENNIS

AFFIDAVIT

OF RECEIVED EDWIN DENNIS

2006 FEB -1 A 10: 76

EDWIN D DENNIS
Plaintiff

V.
Tommy THREAT, ET AL.
Defendants

A
A Civil Action NO 3:05-CV-919-J

State of Alabama
County of Lee

1) My name is Edwin Dee Dennis, I am over the age of 19. I am currently being detained at the Lee County Detention Facility. I was arrested on Feb 22nd 2005 and have been here ever since.

2) On July 14 2005 I was involved in a fight with an inmate from another cell on the same wing I was on during Sick call. Me and the gentleman in question have the same case and we not supposed to be in communication with each other. Jailers also knew that I and Templeton (the other J-3) were enemies. Had sick call be done one cell at a time the fight never would have occurred. To ensure inmate safety each cell is supposed to go individually but on the

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day in question the whole wing was taken at one time therefore creating a security risk.

3) After the fight I was taken to solitary confinement on E-wing. I was then placed in E-5 4 days later. Officer's stated to me that I had to be on that wing to keep me and Templeton separated. Usually when inmates get into a fight they are moved to separate cells but on the same wing. I was already in a different cell than Templeton and there was no real reason to move me. I was put in a cell with convicted state inmates and violent offenders. I am neither. During the 6 days I was in that cell on that wing one of the state inmates (Teddy Houston) had started causing problems. Six of the nine inmates housed in that cell sight three different requests asking for that individual to be moved. These request were handed directly to Sgt Threat's staff members. On July 23rd Sgt Threat came into the cell at lock down and told Houston request were being wrote on him by us. He also told us the

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Lt. Welch said he would not move anyone and that we would have to settle it our selves. Immediately after he left inmate Houston began to verbally harass me and threaten me stating that when the doors opened he was going to beat me up. At breakfast when the doors opened up Houston came out of his cell wearing his shoes and cussing. He was calling me names so I approached him arguing with him. He balled his fist and stepped toward me and we began to fight. During the fight I was hit in the jaw and my tooth was knocked loose. I was placed in Isolation once again and served a disciplinary for the first fight wich happened 10 days before. I informed the officers something was wrong with my mouth that I couldn't spit or swallow but was not allowed to see the nurse till 5:00 Pm. She (Debbie Burk) refused to give me anything for pain. I was not allowed to see the doctor for three days during wich time I could not eat. The doctor ordered x rays. During

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the x ray process the Radiologist told me the machine she was using was not really the right one for the job and more x rays may have to be ordered by the doctor. I was informed by the nurse the x rays came back negative. I still could not chew and continued to complain. Two weeks later I was finally taken to the dentist who took x rays with a more modern machine. He informed me that the tooth had been knocked away from the bone and the bone itself was splintered. He then extracted the tooth.

4) On 9-8-05 while exiting the shower I slipped in water standing in front of the shower and hurt my shoulder. I asked staff members to please take me to see the nurse but was told to write a request. I could not lay down because of the pain in my shoulder and when I went to see the nurse on the 9th she again refused to give me aspirin or anything. Again this was nurse Burke. I did not see the doctor until the 13th. During this time the pain in my

Shoulder was so intense that I^{S.}
has to sleep sitting up. I was
perscribed medication by the doctor
when I went to see him. Nurse
Burke was later fired for some
reason.

I swear to the best of my
knowledge that the above is
true.

Edwin D Dennis
EDWIN D Dennis.